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 QUO VAT ESTELL

7 **UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**

9 QUO VAT ESTELL,

10 Plaintiffs,

11 vs.

12 JOHN MCHUGH,

13 Defendants

14 } Case No.: 15-cv-04898-MEJ

15 } **PLAINTIFF'S REQUEST FOR**
 16 } **CONTINUANCE OF INITIAL**
 17 } **CASE MANAGEMENT**
 18 } **CONFERENCE AND RELATED**
 19 } **DATES**

20 Plaintiff Quo Vat Estell, by and through her attorney Maureen McFadden,
 21 respectfully requests that the Court continue the initial case management
 22 conference currently set for January 28, 2016 at 10:00 a.m., and all related dates,
 23 by about 90 days or at the Court's convenience.

24 The complaint and related documents were not timely served on defendant.
 25 Ms. McFadden is a sole practitioner. She is also the single mother of a toddler son,
 26 and legally responsible for making health care and other decisions on behalf of her
 27 very sick mother, Kathleen McFadden, who lives in Southern California. In recent



1 months, Ms. McFadden has been required to take substantial time away from work
 2 to deal with emergencies relating to her mother.

3 Additionally, Ms. Estell's complaint needs to be amended to include related
 4 claims that are currently the subject of an EEO proceeding, *Quo Vat Estell v. U.S.*
 5 *Army*, EEOC Case No. 550-2015-00087x, assigned to the Honorable David Kelley.
 6 Plaintiff's counsel had intended to wait for Judge Kelley's order on a hearing held
 7 August 21, 2016¹ prior to moving those claims into Ms. Estell's case now pending
 8 in this Court. For unknown reasons, Judge Kelley has still not issued that order.
 9 Ms. Estell is not willing to accept any further delays and wishes to have all her
 10 claims proceed in this Court as soon as possible, regardless of the status of Judge
 11 Kelley's issuance of the order from the August 21, 2015 hearing.

12 Ms. McFadden anticipates having the amended complaint filed and served
 13 by the end of this week.

14 DATED: January 19, 2016 LAW OFFICES OF MAUREEN E. MCFADDEN
 15

16
 17 By: _____
 18 Maureen E. McFadden

19 Attorney for Plaintiff
 20 QUO VAT ESTELL

21 The Case Management Conference is CONTINUED to May 5, 2016 at
 22 10:00 a.m. All deadlines are adjusted accordingly.

23 Dated: January 20, 2016



24
 25
 26 ¹ The hearing related to plaintiff's requested amendments in that matter, and
 27 scheduling issues.